

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.	:	
	:	
Plaintiffs,	:	
	:	Case No. 04-cv-2799 (BMC)(VVP)
-against-	:	
	:	
ARAB BANK, PLC,	:	
	:	
Defendant.	:	

**PLAINTIFFS' AMENDED COMPLAINT
PURSUANT TO THE COURT'S FEBRUARY 25, 2015 ORDER**

Pursuant to Federal Rules of Civil Procedure 15(a)(2) and 21, and the Court's February 25, 2015 Order, in addition to the parties previously named and the claims already alleged, Plaintiffs respectfully submit the following additional allegations and add each of the following parties as Plaintiffs: MICHAL HONICKMAN, MICHAL HONICKMAN FOR THE ESTATE OF HOWARD GOLDSTEIN, and DAVID GOLDSTEIN. The additional Plaintiffs, by their attorneys, allege the following upon information and belief.

THE ADDITIONAL PLAINTIFFS

The Goldstein Family

1. Plaintiff Michal Honickman, formerly known as Mindy Goldstein, is a citizen of the United States and the State of Israel.
2. Michal is the widow of Howard Goldstein, and brings this action both individually, and as the legal representative of Howard Goldstein's estate.
3. Michal is the mother of Plaintiffs Chana Freedman and David Goldstein. Howard Goldstein was the father of Plaintiffs Chana Freedman and David Goldstein.
4. On Friday, June 20, 2003, their 27th wedding anniversary, Michal and Howard

were driving on Route 60, just north of Ofra, heading to Jerusalem.

5. Michal was seated in the rear seat of the car, on the driver's side, behind Howard, who was driving the car.

6. Two Hamas terrorists armed with Kalashnikovs stood by the side of the road near the Yabroud bridge.

7. The two terrorists proceeded to shoot repeatedly at the passing vehicle containing the Goldstein family.

8. Howard Goldstein was struck by at least one bullet and lost consciousness (as noted below, he subsequently died). Plaintiff Eugene Goldstein (who had been shot in the upper torso) grabbed the steering wheel and maintained control of the vehicle until it crashed and rolled over, south of Ofra.

9. Michal was injured when glass fragments from the car vehicle's windows struck her body, including her left eye. She also sustained hairline fractures of her ribs, bruising, and physical trauma when the vehicle eventually crashed and rolled over.

10. Michal has suffered severe mental anguish and extreme emotional distress after coming under attack, witnessing the death of her husband, whom she had to bury and mourn with her children, Plaintiffs Chana Freedman and David Goldstein, and watching her in-laws getting shot and hospitalized, all in the context of what had been, prior to that point, a joyous family occasion celebrating her son David's wedding.

11. Michal has suffered the loss of her husband's companionship, comfort, services, society, day-to-day assistance, support, advice and counsel that she had previously enjoyed.

12. Michal has suffered trauma as a result of surviving the attack.

13. As a result of the attack and the loss of her husband of twenty-seven years, Michal

has experienced deep grief and tried to cope with the absence of her husband in her life and in the lives of their children.

14. Plaintiff David Goldstein is a citizen of the United States and the State of Israel.

15. As alleged above, the attack occurred when Howard and Michal were traveling to Jerusalem. They were going for the weekend to further celebrate David's wedding (which had taken place the night before).

16. David was staying at a Jerusalem hotel awaiting his family's arrival for weekend wedding celebrations when he was notified that something had happened to his parents and his grandparents, and that they had been taken to Hadassah Hospital.

17. Upon arrival at the hospital, David learned that his father had been killed in the attack, and that his mother and grandparents had been injured.

18. Prior to the attack, David frequently spoke to his father, including on the morning of his father's death.

19. As a result of his father Howard's death, Plaintiff David Goldstein has suffered severe mental anguish and extreme emotional distress.

INCORPORATION OF ALLEGATIONS AND CLAIMS FOR RELIEF

20. These additional Plaintiffs expressly incorporate herein by reference the allegations and claims made in paragraphs 1-4 and 269-426 of the First Amended Complaint filed on or about August 10, 2004 in the above-captioned matter.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court:

- (a) Accept jurisdiction over this action;
- (b) Enter judgment against Arab Bank and in favor of each Plaintiff for

compensatory damages in amounts not less than those set forth herein and additional sums in amounts to be determined at trial;

(c) Enter judgment against Arab Bank and in favor of each Plaintiff for treble damages pursuant to 18 U.S.C. § 2333;

(d) Enter judgment against Arab Bank and in favor of each Plaintiff for any and all costs sustained in connection with the prosecution of this action, including attorneys' fees, pursuant to 18 U.S.C. § 2333;

(e) Order any such equitable relief to which these Plaintiffs might be entitled;

(f) Enter an Order declaring that Arab Bank has violated, and is continuing to violate, the Anti-Terrorism Act, 18 U.S.C. § 2331 et seq.; and

(g) Grant such other and further relief as justice requires.

PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Dated: March 13, 2015
Hackensack, NJ

OSEN LLC

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